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6 Attorney for Mark Canlas Cuyugan

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**
9

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 MARK CANLAS CUYUGAN,
14

15 Defendant.
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Case No. 2:19-cr-00300-JCM-EJY-2

**STIPULATION TO MODIFY
CONDITIONS OF RELEASE**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.
18 Frierson, United States Attorney, and Edward G. Veronda, Assistant United
19 States Attorney, counsel for the United States of America, and Rene L. Valladares,
20 Federal Public Defender, and Joanne L. Diamond, Assistant Federal Public
21 Defender, counsel for Mark Canlas Cuyugan, that the Court modify his conditions
22 of release.

23 The Stipulation is entered into for the following reasons:

24 1. On November 20, 2019, the Court ordered Mr. Cuyugan's release on
25 a personal recognizance bond with certain conditions, including a requirement that
26 he not open new bank accounts or lines of credit. ECF No. 32 at 5.

2. On November 15, 2021, the Court granted the parties' stipulation to modify this condition so Mr. Cuyugan could open a business bank account, with the prior authorization of pretrial services. ECF No. 293 at 3. He subsequently opened a business account at Chase Bank.

3. Mr. Cuyugan is trying to improve his credit. To do so, he needs to open a credit card. He is unable to obtain a card for individuals with poor credit through his Chase business account.

3. Mr. Cuyugan moves the Court to modify this condition so he can open a personal bank account and a credit card at Navy Federal Credit Union. He has confirmed his eligibility for the credit union, and that an appropriate credit card is available. However, the credit union requires him to open a checking account before he can obtain the credit card.

4. Counsel has spoken with Pretrial Services concerning this issue. Pretrial Services supports the requested modification.

5. The government has no objection to the requested modification.

DATED: October 12, 2023.

RENE L. VALLADARES
Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Joanne L. Diamond
By _____
JOANNE L. DIAMOND
Assistant Federal Public Defender

/s/ Edward G. Veronda
By _____
EDWARD G. VERONDA
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

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4 UNITED STATES OF AMERICA,

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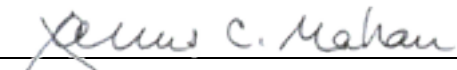
8 Defendant.
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ORDER

10 IT IS THEREFORE ORDERED that Mr. Cuyugan's conditions of release be
11 modified to allow him to open a personal bank account and credit card at Navy
12 Federal Credit Union.

13 DATED October 13, 2023.

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15 UNITED STATES DISTRICT JUDGE
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